

## Affidavit

County of Lorain

Ss:

State of Ohio

Now comes the undersigned, Jonathan E. Rosenbaum, who being duly sworn states as follows:

1. I am an attorney licensed to practice law in the state of Ohio and in some of the United States District Courts including the Northern District of Ohio;
2. I was retained by Peter Lora as the guardian for Jane Doe and Victoria Bloom as the guardian for Jane Roe to file suit against Defendant Dean Boland for downloading the innocent images of minors Jane Doe and Jane Roe, morphing them into sexually explicit images, and publishing them throughout the United States;
3. I brought suit on their behalf in the USDC, ND Ohio and the complaint was assigned Case No. 1: 07 CV 2787
3. Plaintiffs Lora and Bloom both informed me that they were told by the United States Attorney's Office for the Northern District of Ohio that their wards, Jane Doe and Jane Roe, were two of the four victims whose images were downloaded, morphed into sexually explicit images, and the subject of the Pre-Trial Diversion Agreement;
4. As a result of my position as counsel for the Plaintiffs, I have been afforded the opportunity to discuss this case and the Pre-Trial Diversion Agreement with the United States Attorney's Office and a special agent of the FBI. Both representatives of the FBI and the USAO for the ND of Ohio confirmed to me that images of Plaintiffs Jane Doe and Jane Roe which were "morphed" by Defendant Dean Boland into sexually explicit image.

5. Representatives for the USAO for the ND of Ohio and a representative of the FBI also confirmed that the two images mentioned in Mr. Boland's Pre-Trial Diversion Agreement that were downloaded from Istockphoto.com were images of Plaintiffs Doe and Roe;
6. Solely because of my position as counsel for the Plaintiffs and because my clients were the two of the four victims of Mr. Boland's criminal conduct as set forth in the diversion agreement, I was provided a copy of that agreement which I attached as Exhibit "1" to the complaint;
7. As a result of my position as counsel for the Plaintiffs, I have been afforded the opportunity to meet with the USAO for ND of Ohio and a special agent of the FBI. Copies of the innocent images of Plaintiffs Doe and Roe which both agencies represented to have been downloaded by Defendant Boland, stored in his computer, and which were the subject of diversion agreement because the images were morphed into sexually explicit photos were shown to me on more than one occasion.
8. Peter Lora and Victoria Bloom have identified the persons depicted in these innocent images as their wards Plaintiffs Jane Doe and Jane Roe.
9. As a result of my position as counsel for the Plaintiffs, I have been afforded the opportunity to meet with the USAO for ND of Ohio and a special agent of the FBI. Copies of the sexually explicit images which both agencies represented to be created by Defendant Boland, stored in his computer, and which were the subject of diversion agreement were shown to me on more than one occasion.
10. I was able to personally see and ascertain that the faces of the persons depicted in the innocent images and the sexually explicit images are the same and that of those identified to me by Peter Lora and Victoria Bloom as Jane Doe and Jane Roe.

11. As a result of my position as counsel for the Plaintiffs, I have sent subpoenas and otherwise investigate this case. I have recovered a disk from the Columbiana County Common Pleas Court in which Defendant Boland testified and which contained a sexually image. I recognized the face of the person prominently displayed in the sexually explicit image as the same person depicted in the innocent image shown to me by both the USAO and the FBI. I filed suit on behalf of this person using the name Jane Doe;

12. I have been told by representatives from the USAO and the FBI that images of Jane Doe and Jane Roe were published in courtrooms in Summit County, Warren County, Columbiana County, and Hamilton County in Ohio as well as in a federal court in Oklahoma. This corresponds to the geographical locations mentioned in Defendant Boland's Re-Trial Diversion Agreement.

13. Based upon the above, I have personal knowledge that Plaintiffs Doe and Roe are two of the four victims which are the subject in Defendant's Boland's Pre-Trial Diversion and are in fact the two minors whose images Dean Boland downloaded from Istockphoto.com

Further Affiant sayeth naught.

  
Jonathan E. Rosenbaum

Sworn to and subscribed before me this 18<sup>th</sup> day of July, 2008.

  
Notary Public



**SHARI LANE**  
NOTARY PUBLIC  
STATE OF OHIO  
My Comm. Exp. 4-30-11